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March 9, 2018

VIA CM/ECF

Honorable Magistrate Judge Steven I. Locke
United States District Court
Eastern District of New York
Long Island Courthouse
100 Federal Plaza
Central Islip, NY 11722

Re: Burch, et. al. v. V.K. Mechanical, et.al.,
Dkt. 16- 3700

Dear Judge Locke:

The undersigned, along with Patricia Kakalec of Kakalec Law PLLC, represent Plaintiffs Caleb Burch, Kenton Kirpon, and Opt-In Plaintiff Vicente Herrera (collectively "Plaintiffs") in the above-captioned matter. Plaintiffs come before Your Honor, pursuant to Local Rule 37, to request an Order compelling Defendants' discovery responses.

By way of history, post consolidation Plaintiffs' discovery demands were served on the defendants' counsel on April 30, 2017, making Defendants' responses due on May 30, 2017. From the end of May, 2017, through in or about September, 2017, Plaintiffs sent emails, a letter, and had several phone conferences with counsel for Defendants to attempt to obtain Defendants' discovery responses, to no avail. Finally, in or about the beginning of October, 2017, Defendants provided some documents, few, if any which were responsive to Plaintiffs' Production Requests. To date, Defendants have not provided written responses to either Plaintiffs' Requests for Production or Plaintiffs' Interrogatory requests. Efforts by Plaintiffs to obtain Defendants' discovery responses so that depositions can be taken and litigation can move forward have fallen on deaf ears; hence Plaintiffs seek assistance from the Court.

Plaintiffs seek a court order mandating the production of Defendants' Responses to Interrogatories and Production of Documents. Thanking this Court in advance for its anticipated time and attention to this matter.

Respectfully submitted,

s/ Jodi J. Jaffe
Jodi J. Jaffe, Esq.

cc: Richard Howard, Esq. (counsel for Defendants)